

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN**

Jorge Alejandro Rojas,

Plaintiff/Counter-Defendant,

v.

DV Injury Law PLLC, Venar Raad Ayar,
and Daniel P. Heilbrun,

Defendants/Counter-Plaintiffs/Third-Party
Plaintiffs.

v.

Mark Dombrowski,

Third-Party Defendant.

Case No. 2:23-cv-12140-LVP-EAS

DEFENDANTS/COUNTER-PLAINTIFFS/THIRD PARTY PLAINTIFFS'

WITNESS LIST

1. Venar Raad Ayar, 30095 Northwestern Highway, Farmington Hills, MI 48334.
2. Daniel P. Heilbrun, 30095 Northwestern Highway, Farmington Hills, MI 48334.
3. Representatives and Employees not yet identified at DV Injury Law PLLC, 30095 Northwestern Highway, Farmington Hills, MI 48334.
4. Adam Haimour, 30095 Northwestern Highway, Farmington Hills, MI 48334.

5. Jason Karowski, 30095 Northwestern Highway, Farmington Hills, MI 48334.
6. Elizabeth Yount, 30095 Northwestern Highway, Farmington Hills, MI, MI 48334.
7. Representatives of the The Bird Dog Media Group, including but not limited to Mirza Nahic, Jack Goldberg and Dave M.
8. Representatives of Tiburon Media.
9. Jorge Rojas.
10. Mark Dombrowski.
11. Aaron Paul Heeringa, Esq., Partner at Manatt, Phelps & Phillips, LLP, 115 N. Franklin Street, Suite 2600, Chicago, IL 60606. 312-529-6300.
12. Mrs. Aaron Heeringa, wife of witness #10.
13. Other persons presently unidentified who will become known through the discovery process, such as many of the approximately 81 defendants in TCPA violation and other cases and various state court cases brought by the Plaintiff or the Third-Party Defendant and presently unidentified entities or persons who settled without litigation.
14. Experts: PossibleNow Services, Inc dba Compliance Point Litigation Support Services, including but not limited to Darlene Geller-Stoff, Holly Palus, Kenneth R. Sponsler and Jerry Cohen.

15. All witnesses listed by the other Parties.
16. All witnesses made known through the discovery process.
17. Rebuttal witnesses.
18. Defendants/Counter-Defendants/Third-Party Plaintiffs reserve the right
to amend and supplement their Witness List.

Respectfully submitted,

/S/ Mark L. Teicher

Mark L. Teicher (P34301)
Attorney for Defendants/
Counter-Plaintiffs/
Third-Party Plaintiffs

Dated: March 15, 2024

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN

JORGE AJEJANDRO ROJAS
Plaintiff/Counter-Defendant,

vs.

Case. No. 2:23-cv-12140-LVP-EAS
Hon. District Court Judge Linda V. Parker
Hon. Magistrate Judge Elizabeth A. Stafford

DV INJURY LAW PLLC,
VENAR RAAD AYAR and
DANIEL P. HEILBRUN,
Defendants/Counter-Plaintiffs.

CERTIFICATE OF SERVICE

On March 15, 2024 I served:

Andrew Perrong, Esq. and Jeanne Barron, Esq.

Via email and U.S. Mail at:

a@perronglaw.com

and

Andrew Perrong, Esq.
2657 Mt. Carmel Ave.
Glendale, PA 19038

jbarron@jshlaw.com

and

Jeanne Barron, Esq.
3250 W. Big Beaver Rd., Suite 500
Troy, MI 48084

With a copy of:

Defendants/Counter-Plaintiffs/Third Party Plaintiffs' Witness List and the
Certificate of Service.

Respectfully submitted,

/s/Mark L. Teicher

Mark L. Teicher (P34301)

Dated: March 15, 2024